

LOCAL BANKRUPTCY FORM 9019-1**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA****IN RE:****ASHLEY IRENE SMALL****Debtor(s)****Freedom Mortgage
Corporation****Plaintiff(s)/
Movants****vs.****ASHLEY IRENE SMALL**
Dale Magness, JrNathaniel
Tyler**Defendant(s)/
Respondent(s)****CHAPTER 13****CASE NO. 1:19-bk-02055-HWV****NATURE OF
PROCEEDING: Motion for Relief from
Stay****DOCUMENT No. 40****REQUEST TO REMOVE FROM THE HEARING/TRIAL LIST***

CHECK ONE:

☐ The undersigned hereby withdraws the above identified pleading with the consent of the opposition, if any.☒ The undersigned counsel certifies as follows:

(1) A settlement has been reached which will be reduced to writing, executed and filed within (please check only one).

☒ Thirty (30) days.☐ Forty-five (45) days.☐ Sixty (60) days.

(2) If a stipulation is not filed or a hearing requested within the above-stated time frame, the Court may dismiss the matter without further notice.

(3) Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: **September 15, 2023**

/s/ Mario Hanyon

Attorney for: Freedom Mortgage Corporation

*No alterations or interlineations of this document are permitted. This request must be filed twenty-four (24) hours prior to the hearing.